

EXHIBIT B

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December 15, 2023

VIA EMAIL

Byron A. Divins
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Re: *State Farm Mutual Automobile Insurance Company v. Metro Pain Specialists, P.C., et al.*, Civil Action No. 1:21-cv-05523-MKB-PK

Dear Byron:

Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, “Plaintiffs”) write regarding certain discovery issues with defendants Vadim Dolsky and Optimum Health Acupuncture P.C. (“Defendants”).

First, Plaintiffs have not received written responses to discovery requests served on November 3, 2023, or a date by which such written responses will be served. As you know, on November 24, Plaintiffs agreed to extend the deadline by which Defendants’ written responses were due until December 13, 2023. On December 14, Plaintiffs inquired by email as to the status of the written responses, to which Defendants replied that responses would soon be produced. Please advise as to a date certain by which Defendants’ written responses will be served.

Second, Plaintiffs have not received any response to their letter dated December 4, 2023, which proposes search terms for Defendants’ collection of electronically stored information. The letter requested Defendants’ availability to meet and confer regarding custodial sources and proposed search terms. Please advise on your availability to meet and confer at your earliest convenience.

Finally, by email dated December 14, Defendants advised of their inability to access the documents Plaintiffs had produced in this action on an external drive. As indicated in Plaintiffs’ reply email, we are available to assist in troubleshooting these technical issues, including by making available our technology team. Please advise on your availability to discuss these issues further.



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Sincerely,

/s/ Christopher T. Cook

Christopher T. Cook

cc: Michael Cardoza
Alexandra Mule
Omid Zareh